

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

:

- v. -

:

SEALED

SUPERSEDING INFORMATION

OLIVER HARGREAVES,

:

S1 18 Cr. 746 (KPF)

Defendant.

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COUNT ONE

(Conspiracy to Commit Money Laundering)

The United States Attorney charges:

1. From at least in or about 2016, up to and including in or about 2018, in the Southern District of New York and elsewhere, OLIVER HARGREAVES, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit money laundering, in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1956(a)(2)(B)(i).

2. It was a part and object of the conspiracy that OLIVER HARGREAVES, the defendant, and others known and unknown, knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such a financial transaction which in fact involved the proceeds of specified unlawful activity, to wit, the proceeds of conducting,

financing, managing, supervising, directing and owning an illegal gambling businesses, in violation of Title 18, United States Code, Section 1955, and the proceeds of the distribution of controlled substances, in violation of Title 21, United States Code, Section 841, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), to wit, HARGREAVES agreed to facilitate the transfer of proceeds of (a) unlawful internet gambling enterprises engaged in soliciting and processing wagers from customers worldwide, including customers based in the United States, and (b) a business engaged in the sale of marijuana products in the United States, from one and more bank accounts, including bank accounts located in the United States, knowing that the proceeds derived from unlawful activity.

3. It was further a part and an object of the conspiracy that OLIVER HARGREAVES, the defendant, and others known and unknown, would and did transport, transmit, and transfer, and attempt to transport, transmit, and transfer a monetary instrument and funds from a place in the United States

to and through a place outside the United States, and to a place in the United States from and through a place outside the United States, knowing that the monetary instrument and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, to wit, the proceeds of conducting, financing, managing, supervising, directing and owning an illegal gambling businesses in violation of Title 18, United States Code, Section 1955, and the distribution of controlled substances in violation of Title 21, United States Code, Section 841, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i).

(Title 18, United States Code, Sections 1956(h).)

COUNT TWO

(Conspiracy to Commit Money Laundering)

The United States Attorney further charges:

4. In or about 2011, in the Southern District of New York and elsewhere, OLIVER HARGREAVES, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit

money laundering, in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1956(a)(2)(B)(i).

5. It was a part and object of the conspiracy that OLIVER HARGREAVES, the defendant, and others known and unknown, knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such a financial transaction which in fact involved the proceeds of specified unlawful activity, to wit, the proceeds of conducting, financing, managing, supervising, directing and owning an illegal gambling businesses, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i), knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), to wit, HARGREAVES agreed to facilitate the transfer of proceeds of unlawful internet gambling enterprises engaged in soliciting and processing wagers from customers worldwide, including customers based in the United States, from one and more bank accounts, including bank accounts located in

the United States, knowing that the proceeds derived from unlawful activity.

6. It was further a part and an object of the conspiracy that OLIVER HARGREAVES, the defendant, and others known and unknown, would and did transport, transmit, and transfer, and attempt to transport, transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States, and to a place in the United States from and through a place outside the United States, knowing that the monetary instrument and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, to wit, the proceeds of conducting, financing, managing, supervising, directing and owning an illegal gambling businesses in violation of Title 18, United States Code, Section 1955, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i).

(Title 18, United States Code, Section 1956(h).)

COUNT THREE

(Conspiracy to Commit Bank Fraud)

The United States Attorney further charges:

7. From at least in or about 2016, up to and including in or about 2018, in the Southern District of New York and elsewhere, OLIVER HARGREAVES, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit bank fraud, in violation of Title 18, United States Code, Section 1344.

8. It was a part and object of the conspiracy that OLIVER HARGREAVES, the defendant, and others known and unknown, willfully and knowingly, would and did execute, and attempt to execute, a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344, to wit, HARGREAVES caused financial institutions to authorize the transfer of and to transfer the proceeds of the specified unlawful activities specified in Count

One of this Superseding Information, namely, conducting, financing, managing, supervising, directing and owning all or part of an illegal gambling business, in violation of Title 18, United States Code, Section 1955, and the distribution of controlled substances, in violation of Title 21, United States Code, Section 841, by misrepresenting and omitting material facts to those financial institutions.

(Title 18, United States Code, Section 1349.)

COUNT FOUR

(Conspiracy to Commit Extortion)

The United States Attorney further charges:

9. From at least in or about March 2017, up to and including in or about August 2017, OLIVER HARGREAVES, the defendant, who was arrested in the Southern District of New York, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit extortion, as that term is defined in Title 18, United States Code, Section 1951(b)(2), and thereby would and did obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, HARGREAVES and co-conspirators not named as defendants herein, who believed that an individual residing in the United Kingdom

("Individual-1") had stolen the proceeds of an international fraud scheme that were supposed to be wired to the United States, used threats of physical harm to demand that Individual-1 return the fraud proceeds via international wire.

(Title 18, United States Code, Sections 1951 and 3238.)

FORFEITURE ALLEGATIONS

10. As a result of committing the offenses charged in Counts One and Two of this Superseding Information, OLIVER HARGREAVES, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offenses, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offenses.

11. As a result of committing the offense charged in Count Three of this Superseding Information, OLIVER HARGREAVES, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting or derived from, proceeds the defendant obtained directly or indirectly, as a result of the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds

traceable to the commission of said offense.

12. As a result of committing the offense charged in Count Four of this Superseding Information, OLIVER HARGREAVES, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

13. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



GEOFFREY S. BERMAN
UNITED STATES ATTORNEY

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(18 U.S.C. §§ 1956, 1349, 1951 and 3238)

GEOFFREY S. BERMAN
United States Attorney.
